

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
UNITHAI MARITIME LIMITED,	:	
	:	
Plaintiff,	:	07 CV 5730 (BSJ)
	:	
v.	:	
	:	
RP LOGISTICS PVT. LTD. and	:	
R. PIYARELALL INTERNATIONAL	:	
PVT. LTD.	:	
Defendants.	:	
-----X		

**NOTICE OF MOTION FOR LEAVE TO FILE AMENDED COMPLAINT
(FED. R. CIV. P. 15(a))**

PLEASE TAKE NOTICE that Unithai Maritime Limited, by its counsel Vandeventer Black LLP, hereby respectfully moves this court for leave to file an Amended Verified Complaint due to an inadvertent typing error in Paragraph 4 of the Verified Complaint filed on June 14, 2007.

Dated: July 25, 2007

Respectfully Submitted,

/S/ Lawrence G. Cohen
Lawrence G. Cohen (NY Bar No. LC3226)
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Ethan G. Ostroff (Of Counsel)
Attorneys for Unithai Maritime Limited

CERTIFICATE OF SERVICE BY ECF

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On July 25, 2007, I served a complete copy of Unithai Maritime Ltd.'s Notice of Motion for Leave to Amend Complaint to the following attorneys by ECF at their ECF registered addresses:

CHALOS O'CONNOR & DUFFY, LLP
366 MAIN STREET
PORT WASHINGTON, NEW YORK 11050

By: /S/ Lawrence G. Cohen
Lawrence G. Cohen

Dated: July 25, 2007
Norfolk, Virginia